

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

**Schools and Libraries
Universal Service
Support Mechanisms**

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CC Docket No. 02-6

**WORLDCOM, INC.
REPLY COMMENTS**

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May 6, 2002

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I. Summary

WorldCom, Inc. (“WorldCom”) takes this opportunity to reply to approximately 70 comments¹ submitted in the above-captioned docket pertaining to possible reforms of the Schools and Libraries Universal Support Mechanism (“Schools and Libraries Program”).² The Commission should give carriers the discretion to determine whether to provide reimbursement via a discount on the bill or to use the billed entity applicant reimbursement (BEAR). Carriers are generally able to provide discounts on bills, but in very small number of cases find it technically infeasible. For this reason the Commission should adopt rules that

¹ WorldCom relies on the comments from the following parties in its Reply Comments: General Communication, Inc (GCI), AT&T Wireless, AT&T, Sprint, Verizon, Joint Comments of SBC and Bell South (SBC-BS), Tel/Logic Inc (Tel/Logic), Tamsco Telecommunications (Tamsco), Spectrum Communications (Spectrum), American Library Association (ALA), Alabama Department of Education (Alabama DOE), E-rate Elite Services (E-rate Elite), Colorado Department of Education (CODOE), Intelenet Commission/Indiana Department of Education/Indiana State Library (INDOE), Iowa Department of Education (IADOE), Council of Chief State School Officers, American Library Association (ALA), American Association of School Administrators (AASA), Montana Public Service Commission (MTPSC), Arkansas E-rate Workgroup (AEWG), New York City Board of Education (NYBOE), Education and Library Networks Coalition (EdLiNC), Michigan Information Network (MIN), National Education Association/International Society for Technology in Education/Consortium for School Networking (NEA), Florida Department of Education (FLDOE), Illinois Board of Education (ILBOE), California Department of Education (CADOE), Boston Public Schools (Boston), Universal Service Administrative Company (USAC), WiscNet, Los Angeles Unified School District (LAUSD), York County Library System (York), Urban School Coalition, West Virginia Department of Education (WVDE), Florida Public Service Commission (FLPSC), Wisconsin Department of Public Instruction (WDPI), North Carolina Department of Cultural Resources, Montana Independent Telecommunications Systems (MTS), Software Information Industry Association (SIIA), Missouri Research and Education Network (MORENET), Alaska Department of Education and Early Development (Alaska EED).

² *Schools and Libraries Universal Service Support Mechanism*, Notice of Proposed Rule Making and Order, “NPRM”, CC Docket No. 02-6, Released January 25, 2002

encourage carriers to accommodate the reimbursement needs of applicants, but give carriers final discretion to choose the reimbursement method. WorldCom also supports proposals to have SLD directly reimburse applicants, provided carriers are notified when SLD has received the applicant's Form 486.

Carriers request the Commission recognize that legitimate circumstances may prevent them from reimbursing a school or library within 20 days. Carriers are almost always able to meet a 20 day deadline, but every once-in-a-while are unable to do so. Carriers urge the Commission to recognize that fines should not be imposed for cases of justifiable tardiness.

The Commission should codify its policy of using unused funds to reduce future carrier contribution requirements. The Commission has already found that its decision to carry forward unused funds by reducing subsequent year contribution requirements is consistent with Section 554.709(b) of its rules. Absent this outcome, customers of contributing carriers will face increasing surcharges as long-distance revenues decline, and universal service funding requirements increase.

Schools and Libraries should not be permitted to transfer any asset funded with the assistance of the Schools and Libraries Program. Congress prohibited schools and libraries from transferring funded equipment and services to other entities for anything of value. When schools and libraries make transfers to other schools in their school district they benefit by being able to draw upon a district-level budget that is higher than it would be without the transfer.

The Commission is interested in simplifying and clarifying the application process. One proposal involves applicants choosing services from a limited pull-down list found at SLD's web

site. Most parties were concerned that limiting eligible services to services found on such a list at the Schools and Libraries Division (SLD) web site would be too restrictive, require eliminating the category of conditionally eligible services, or require an involved and complicated procedure to keep the list up-to-date. Some schools and libraries would reduce confusion by having the Commission reimburse them for their application expenses. However, this proposal would involve the funding of services not authorized by Congress, and must be rejected. Rather the Commission should both simplify the application process and recognize that there may be a need for SLD to provide greater application assistance to schools and libraries.

Some schools are concerned that the growth in demand for wide area networks (WANs) will drain funding away from internal connections, a Priority 2 service they value more than WANs. WorldCom proposes spreading out the WAN discount according the depreciable life of WAN assets. By annually funding only the depreciable amount (as determined by the economic life of the asset), participants will not have a greater monetary incentive to purchase either leased or owned WANs over other services, and they will be in a position to make their funding requests on the basis of an evaluation of their specific educational needs.

II. Post Commitment Issues

A. The Commission Should Grant Carriers The Final Discretion To Determine The Reimbursement Method

Carriers and schools are divided over which party will have the discretion to determine whether discounts will be provided by means of the BEAR form or by means of a discount on the bill. Schools are unified in their request that the choice be at their discretion.³ Carriers are unified that the choice be at their discretion.⁴ Both groups maintain that not having discretion imposes on them unnecessary administrative costs. WorldCom has already spent one-half million dollars to modify its billing systems in order to be able to process either a BEAR reimbursement or offer a discount on bill. We are able to accommodate most of our E-rate customers who request discounts on bills. However, approximately 30-40 of our 2000 E-rate customers (approximately 2%) obtain service in configurations that do not permit us to provide a discount on the bill. One problem common to these customers is that they have received funding approval under several different funding request numbers (FRNs), but obtain service under a single account. Our billing systems apply discounts to usage at the account level, making it impossible to provide a discount on the bill for a customer who has multiple FRNs in a single account. WorldCom would have to modify its entire billing system in order to identify usage at the line level of a customer's account. The financial state of the industry does not permit

³ MTS at 5, SIIA at 4, ALA at 38, NEA at 17, MORENET at 9, MIN at 14, WISCNet at 3, LAUSD at 5, EDLine at 17, IADOE at 8, INDOE at 6, CODOE at 7, CADOE at 4, Boston at 7, NYBOE at 5.

⁴ WorldCom at 15, ATT wireless at 5; Sprint at 10, Verizon at 7, SBC at 13, GCI at 8, USAC at 21, AASA at 5, Tel/Logic at 2.

WorldCom to make further investments to modify its billing systems. Therefore, WorldCom requires the ability to determine if providing a discount on a bill is economically feasible.

A third billing alternative, strongly supported by schools is to have SLD directly compensate schools.⁵ WorldCom would support this reimbursement method, provided carriers are notified the applicant has requested direct reimbursement as soon as the SLD receives its the Form 486.

B. Carriers Request The Commission Recognize That Legitimate Circumstances May Prevent Them From Distributing A Payment Within 20 Days

The Commission seeks comment on whether service providers should be required to remit payments to schools or libraries within twenty days of receiving them from USAC.⁶ WorldCom is generally able to meet this deadline, but has experienced instances when it is not possible. WorldCom is generally able to meet this deadline, but documented in its comments instances when it is not possible due to circumstances outside its control.⁷ Other carriers agree that 20 days should generally be a sufficient amount of time to process BEAR reimbursements, but confirmed WorldCom's experience that there are legitimate instances when a carrier is unable to meet this deadline. Carriers ask the Commission to recognize this, either by retaining

⁵ Council of Chief State School Officers at 39, Alaska EED at 7, Alabama DOE at 5; ATT Wireless at 2; AEWG at 7, MIN at 14, WDPI at 5, WISCNet at 3, ILDOE at 8, CODOE at 7, CADOE at 4, Tel/Logic at 2.

⁶ NPRM, &35.

⁷ WorldCom at 11.

the existing system of having SLD work with tardy service providers,⁸ or by clarifying that justifiable tardiness is permitted.⁹

C Unused Funds Should Be Used To Reduce Future Contribution Requirements

The customers of the major long-distance carriers, WorldCom, AT&T and Sprint, fund the majority of all universal service programs, including the Schools and Libraries Program. In recent years, the revenue base for these carriers has significantly declined.¹⁰ In addition universal service contribution requirements could soon increase by \$2.5 billion per year, a 45% increase over current contribution requirements.¹¹ The combination of declining long distance revenues and escalating contribution requirements will force long-distance carriers to increase surcharges. Carriers recognize that unused funds returned to contributing carriers will leave less available for E-rate customers. But this outcome must be weighed against the benefit that will accrue to regular customers. In its Twelfth Order on Reconsideration the Commission has already found that its decision to carry forward unused funds by reducing subsequent year contribution requirements is consistent with Section 554.709(b) of its rules.¹² The Commission should maintain this policy.

⁸ Sprint at 11.

⁹ WorldCom at 11; SBC-Bell Sount at 15; Verizon at 10.

¹⁰ AT&T at 2.

¹¹ WorldCom at 15.

¹² Federal-State Joint Board on Universal Service, Twelfth Order on Reconsideration, CC Docket No. 96-45, Released May 28, 1999, at & 79.

D. Schools and Libraries Should Not Be Permitted To Transfer Any Asset Funded With The Assistance Of The E-rate Program

There is nearly universal condemnation of the practice of transferring equipment by one school to another in the same school district. Some parties would limit transfers to once every two years.¹³ Most support the Commission's proposal to limit transfers to once every three years for internal connection equipment other than cabling, and once every ten years for cabling.¹⁴ The Commission proposed this limitation in the belief that its rules do not prohibit a participant to transfer assets or services when the transfer did not involve an exchange of money. However Congress directed the Commission to prohibit transfers that involved an exchange of anything of value.¹⁵ WorldCom showed that transfers within the same school district make additional funds available to the transferring school, and therefore constitute a clear violation of Congressional intent. For this reason, the Commission must simply prohibit any transfer within the same school district.

¹³ Alaska EED at 8, INDOE at 7, Spectrum at 8, ALA at 42, MIN at 15, FLDOE at 8, ILDOE at 22.

¹⁴ Sprint at 12, Verizon at 15, SBC at 18, FLPSC at 6, MTS at 6, MT PSC at 4, ALA at 42, NEA at 19, MIN at 16, EDLinc at 12, CODOE at 8, Boston at 7, TAMSCO at 3.

¹⁵ 47 U.S.C. §254(h)(3)

III. Application Issues

A. Comments Reject The Use Of A Limited Pull-Down List

In its Notice, the Commission sought comment on the desirability of limiting eligible services to services that had been pre-approved and made available for selection on SLD's web site. The proposal, as stated, was rejected by nearly all commenting parties. Most parties were concerned that limiting eligible services to services found on such a list at the Schools and Libraries Division (SLD) web site would be too restrictive, require eliminating the category of conditionally eligible services, or require an involved and complicated procedure to keep the list up-to-date.¹⁶ On the other hand a number of parties supported the use of a pull-down list if its purpose was to inform schools and libraries of eligible services, but not limit eligible services exclusively to those found on the pull down list.¹⁷ WorldCom supports this use of a pull down list, provided a separate category of conditionally eligible services is maintained.

B. The Commission Should Authorize SLD To Devote Additional Staff And Resources To Assist Applicants

There was widespread agreement that the application process is complicated, confusing, and requires schools and libraries to devote a significant amount of time in order to receive funding. A number of larger school districts advocated having the Schools and Libraries Program

¹⁶ See e.g., comments of WorldCom at 4, Alaska EED at 3; Sprint at 2, Verizon at 11, SBC at 6, GCI at 3, MOPC at 2, SIIA at 2, MORENET at 2, WDPI at 4, WISCNet at 2, LAUSD at 2, ILDOE at 13, CODOE at 2, CADOE at 2, NYBOE at 2, TAMSCO at 1.

¹⁷ See e.g., comments of: Spectrum at 4, ALA at 19, ALA at 21, AEWG at 2, AASA at 3, NEA at 5, York at 1, EDLinc at 8, Urban School Coalition at 1, Fund for Learning at 3.

compensate them for expenses related to the application process.¹⁸ WorldCom opposes this proposal. Congress limited discounts to eligible services offered by communications companies.¹⁹ No eligible company provides application services, and such services are not eligible for funding. In addition the proposal is devoid of cost controls. The appropriate response is to simplify the application process and recognize that there may be a need for SLD to provide greater application assistance to schools and libraries.

C. WANS, Cable, And Other Eligible Assets Should Be Funded In Accordance With Their Depreciable Lives

Commenting opinion is divided on funding priorities and levels for WANS. Many carriers favor the status quo of retaining leased WANS as a Priority 1 service.²⁰ Many smaller schools and equipment manufacturers appear to support ending the distinction between leased and purchased WANS, and making both types of WANS a Priority 2 service.²¹ Smaller schools are concerned that the growth in demand for WANS will drain funding away from internal connections, a Priority 2 service they value more than WANS. Other schools interested in

¹⁸ See e.g., MIN at 28, WDPI at 3, ILDOE at 7, Council of Chief State School Officers at 64.

¹⁹ 47 U.S.C. 254(h)(1)(b).

²⁰ Sprint at 4, SBC at 9, SBC at 9, ALA at 24, MORENET at 4, WDPI at 4, WISCNet at 2, TAMSCO at 1.

²¹ AEWG at 3, CODOE at 2-3, NORTH CAROLINA DEPARTMENT OF CULTURAL RESOURCES at 3, Alaska EED at 5, ALA at 20, USAC at 13, Spectrum at 7.

limiting the drain on funding support caused by WAN use, advocate spreading out the WAN discount to a 3-5 year period.²²

WorldCom proposed spreading out the WAN discount according the depreciable life of WAN assets.²³ This is the appropriate economic mechanism to use to rationally allocate scarce funding resources. By annually funding only the depreciable amount (as determined by the economic life of the asset), those receiving discounts will not have a greater incentive to purchase either leased or owned WANs over other eligible services, and they will be in a position to make their funding requests on their evaluation of their specific educational needs.

D. Nearly All Parties Oppose Funding Bundled Internet Access And Content

In the NPRM, the Commission asked whether it would be more cost effective to permit a school or library to receive discounts on bundled Internet access and content, even when the bundling Internet access provider offers stand-alone access, when the bundled product is less expensive than a competing provider's unbundled access product.²⁴ Most schools, hoping to eventually receive funding for internal connections, oppose funding internet content, since this

²² AEWG at 4, York at 3, Urban School Coalition at 2, NYBOE at 2, Erate Elite at 4.

²³ WorldCom Comments at 8.

²⁴ NPRM, &25.

could significantly reduce funds available for Priority 2 services.²⁵ WorldCom also opposed the proposal. The Commission already permits schools and libraries to receive funding for bundled internet content and access when this option is the most economical alternative available. The current proposal would fund bundled service even when more economical options, such as unbundled service, were available. The Commission should refrain from adopting the proposal.

IV. Conclusion

For the reasons stated herein, WorldCom urges the Commission to adopt the positions advocated in these Reply Comments.

Sincerely,

Larry Fenster

Larry Fenster

²⁵ Alaska EED at 6; MTS at 4, ALA at 28, AEWG at 6, aasa at 2, NEA at 10, MIN at 8, WDPI at 5, WISCNet at 3, EDLinc at 6, FLDOE at 6, CODOE at 4, Boston at 5.

Statement of Verification

I have read the foregoing and, to the best of my knowledge, information and belief, there is good ground to support it, and it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct.

Executed on May 6, 2002

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